



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P 642 608 929

Cristopher Anderson
Director of Environmental Affairs
L. E. Carpenter & Company
1301 East Ninth Street
Suite 3600
Cleveland, OH 44144

30 SEP 1992

Re: L. E. Carpenter Site
Wharton Borough, Morris County
Treatability Study Report

Dear Mr. Anderson:

The New Jersey Department of Environmental Protection and Energy (the Department) has reviewed the Bioremediation and Soil Flushing Treatability Study Report (Report) dated June 1992 prepared by IT Corporation. The following comments shall be incorporated into the revised Report.

I. 3.1 Initial Characterization, page 3-1

The Report states that although biodegradation of contaminants was demonstrated in bench-scale studies, the effect of the interactions among water, soil ions, organic compounds and microbes will have on biodegradation under in situ conditions is unknown. In addition, the Department is concerned about the presence of the known inorganic contaminants in soils (specifically antimony and lead) and the extent these metals could potentially inhibit the rate of biodegradation. The Report shall discuss these points if any information can be obtained regarding the referenced concerns.



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II. 4.4.2.3 Soil Sampling, page 4-5

The soil conditions have been shown to be quite variable across the site. The Report will discuss the stratigraphy at the area proposed for bioremediation and the potential for inconsistent biodegradation due to the variation of the strata.

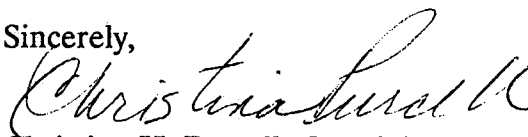
III. 3.4 Recommendations, page 3.3

The Department is in agreement what the results of the treatability study indicate bioremediation may be an effective treatment alternative for the remediation of soils contaminated with bi-2-ethylhexyl phthalate (DEHP), ethylbenzene, and xylene. However, please note that regardless of the selected alternatives for soils remediation, the chosen technology must ultimately mitigate contaminant levels to meet the cleanup standards.

The Department agrees with comments submitted by WESTON dated July 28, 1992 regarding the Report.

The Revised Treatability Study Report shall be submitted October 20, 1992. Copies shall also be submitted to USEPA for review. Should you have any questions, please contact me at (609) 633-1455. Thank you for your continuing cooperation.

Sincerely,



Christina H. Purcell, Case Manager
Bureau of Federal Case Management

cc: Martin O'Neill, Roy F. Weston Inc.
Jonathan Josephs, USEPA
John Prendergast, BEERA
George Blyskun, BGWPA